REMARKS

The present application was filed on June 29, 2001 with claims 1-24. In the outstanding Office Action dated October 17, 2005, the Examiner has rejected claims 2-7, 9-14, 16 and 19-24 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,772,413 to Kuznetsov et al. (hereinafter "Kuznetsov"), in view of Applicants' admitted prior art (hereinafter "APA").

In this response, claims 4 and 6 have been amended. Applicants traverse the §103 rejection of the claims for at least the reasons set forth below. Applicants respectfully request reconsideration of the present application in view of the above amendments and the following remarks.

Claims 2-7, 9-14, 16 and 19-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kuznetsov in view of Applicants' APA. With regard to independent claims 4, 6, 11, 13, 21 and 23, the Examiner contends that Kuznetsov teaches each of the elements set forth in the subject claims, but acknowledges that Kuznetsov fails to disclose "identifying a postback universal resource locator (URL) associated with a target business entity; and sending the translated message to the postback URL; and storing the postback URL associated with the target business entity" (present Office Action; page 3, paragraph 4). However, the Examiner contends that Applicants' APA discloses such features (present Office Action; page 3, paragraph 5). Applicants respectfully disagree with the Examiner's contentions in this regard.

Specifically, Applicants assert that APA fails to teach or suggest identifying and/or generating a postback URL or a conversation identifier associated with a target business entity. Furthermore, APA fails to teach or suggest storing the postback URL associated with the target business entity and sending a translated message to the postback URL. In contrast to the invention set forth in the subject claims, the URL described in Applicants' APA, with reference to FIG. 3, merely describes a catalog URL address of the supplier 308 which a procurement system 304 looks up from its repository 310 of catalog URL addresses (Specification; page 8, lines 5-10). Thus, the URL disclosed in the APA is entirely nonanalogous to the postback URL recited in claims 6, 13 and 23, and the respective claims depending therefrom. Moreover, the postback URL of the invention is identified by the protocol exchange (which is not taught in the APA), is associated with the buyer and/or procurement system (rather than the supplier as in the APA) and is used by the supplier (Specification; page 10, lines 26-27), thereby further distinguishing the claimed invention from the

8

APA. The APA does not disclose any mechanism for <u>generating or identifying a postback URL</u>, among other features of the claimed invention, and therefore fails to supplement the above-noted deficiencies of Kuznetsov. Consequently, the cited combination of Kuznetsov and Applicants' APA fails to teach or suggest the present invention set forth in the subject claims.

Applicants further assert that, contrary to the Examiner's contention in this regard (present Office Action; page 3, paragraph 5), the URL disclosed in the APA cannot reasonably be analogized to a <u>conversation identifier</u>, as recited in claims 4, 11 and 21. Unlike a URL, which merely specifies an Internet Protocol (IP) address where a given resource (e.g., Web page) is located, a conversation identifier, as defined by the present specification, <u>identifies a specific session between two business entities</u>, e.g., the buyer and supplier systems (see, e.g., Specification; page 11, lines 12-13). The APA does not disclose any mechanism for <u>generating or identifying a conversation identifier</u>, among other features of the claimed invention, and therefore fails to supplement the above-noted deficiencies of Kuznetsov. Consequently, the cited combination of Kuznetsov and Applicants' APA also fails to teach or suggest the claimed invention.

Notwithstanding the above traversal, however, claims 4 and 6 have been amended to further clarify at least some of the unique features of the claimed invention. Specifically, claim 4 has been amended to specify that the conversation identifier is generated by the protocol exchange and that the protocol exchange inserts the conversation identifier into the translated message. Similarly, claim 6 has been amended to further clarify that the protocol exchange identifies a postback URL and sends the translated message to the postback URL. Applicants' APA fails to teach or suggest any protocol exchange arrangement, and therefore fails to disclose at least the above-noted features of claims 4 and 6, as amended.

For at least the reasons set forth above, Applicants submit that claims 4, 6, 11, 13, 21 and 23 are patentable over the prior art. Accordingly, favorable reconsideration and allowance of these claims are respectfully solicited.

With regard to claims 2, 3, 5 and 16, which depend from claim 4, claim 7, which depends from claim 6, claims 9, 10 and 12, which depend from claim 11, claim 14, which depends from claim 13, claims 19, 20 and 22, which depend from claim 21, and claim 24, which depends from claim 23, Applicants submit that these claims are also patentable over the prior art by virtue of their

dependency from their respective base claims, which are believed to be patentable for at the least the reasons given above. Furthermore, one or more of these claims define additional patentable subject matter in their own right. Accordingly, favorable reconsideration and allowance of claims 2, 3, 5, 7, 9, 10, 12, 14, 16, 19, 20, 22 and 24 are respectfully requested.

In view of the foregoing, Applicants believe that pending claims 2-7, 9-14, 16 and 19-24 are in condition for allowance, and respectfully request withdrawal of the §103(a) rejections.

Respectfully submitted,

Date: January 9, 2006

Wayne L. Ellenbogen
Attorney for Applicant(s)
Reg. No. 43,602
Ryan, Mason & Lewis, LLP
90 Forest Avenue
Locust Valley, NY 11560
(516) 759-7662